

Exhibit 28



CHECKLIST SECTIONS

- [General Information](#)
- [Amendments](#)

GENERAL INFORMATION

Instructions

When making changes to your record in NMLS, Texas Department of Banking (TX-DOB) requires advance notification for some changes. See the checklist below for details.

Uploading Agency-Specific Documents

If you are required to upload documents to NMLS for an Advance Change Notice (ACN), select “Advance Change Notice” for the document type in the NMLS Document Uploads section. If you are required to upload documents for an amendment that doesn’t require ACN, select the applicable document type in the NMLS Document Uploads section.

If you are required to provide documents outside of NMLS you must mail the document along with the checklist within 5 business days to the address below.

Note: Use the recommended filing naming convention found on the [Document Upload Descriptions and Examples](#).

Helpful Resources

- [Amendments & Advance Change Notice](#)
- [Document Uploads Quick Guide](#)
- [Document Upload Descriptions and Examples](#)

Agency Contact Information

Contact Non Depository Supervision at the Department of Banking by phone at (512) 475-1291 or send your questions via email to mgonzales@dob.texas.gov for additional assistance.

For U.S. Postal Service & Overnight Delivery:

*Texas Department of Banking
Non-Depository Supervision
2601 North Lamar Blvd.
Austin, TX 78705-4294*

THE APPLICANT/LICENSEE IS FULLY RESPONSIBLE FOR ALL OF THE REQUIREMENTS OF THE LICENSE FOR WHICH THEY

AMENDMENTS

- [Change of Legal Name](#)
- [Change of Main Address](#)
- [Change of Legal Status](#)
- [Addition or Modification of Directors or Executive Officers](#)
- [Addition or Modification of Direct Owners or Indirect Owners](#)
 - Addition or Modification of Direct or Indirect Owner (generally, any person, legal or natural, or group acting in concert who owns or controls 25% of more of either the license holder or an entity that controls the license holder): \$1,000 filing fee
- [Addition or Modification of Other Trade Name](#)
- [Deletion of Other Trade Name](#)
- [Addition or Modification of Affiliates/Subsidiaries](#)
- [Change of Disclosure Question\(s\)](#)

Note: Information uploaded or filed in NMLS will not be viewable to the agency until the filing has been attested to and submitted through NMLS. Agency-specific requirements that should be emailed or mailed to the agency on the checklist below must be received with the appropriate checklist within five (5) business days of the electronic submission of your filing through NMLS.

NMLS ID Number	
Licensee Legal Name	

Complete	TX-DOB Money Transmission License Change of Legal Name Amendment Items	Submitted via...
<input type="checkbox"/>	Change of Legal Name: Submit an amendment for a change of Legal Name through the Company Form (MU1) in NMLS no later than the 15 th day after the date the license holder knows or has reason to know of a material change in the information reported in an application or annual report. Refer to Texas Finance Code Section 151.603 .	NMLS
Note	Change of Legal Name Fee: \$0 per license Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	N/A
<input type="checkbox"/>	Surety Bond Rider: Provide an electronic surety bond rider in NMLS (or new bond if applicable) that reflects the entity's new legal name. The name of the principal insured on the bond must match exactly the full legal name of applicant. Contact the surety bond producer to inform them of the legal name change and effective date, so the producer can initiate the Surety Bond Rider Process in NMLS. See the ESB Adoption Table and the ESB for NMLS Licensees page of the NMLS Recourse Center for more information.	Electronic Surety Bond in NMLS

<input type="checkbox"/>	<p>Formation Documents: Formation Documents must be submitted related to this change type.</p> <p>Determine classification of applicant's legal status and submit a State certified copy of the requested applicable documentation detailed below. Provide original formation documents and all subsequent amendments, thereto including a list of any name changes.</p> <ul style="list-style-type: none"> • A copy of the filed Applicant's Certificate of Formation or other organizing documents; • Evidence of registration with the Texas Secretary of State, if the Applicant is not a Texas entity. 	<p>Upload in NMLS: under the Document Type <u>Formation Document</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>
<input type="checkbox"/>	<p>Other Trade Name: File stamped copies of any assumed name filings with the Secretary of State and the county if any assumed names are to be used.</p>	<p>Upload in NMLS: under the Document Type <u>Trade Name/Assumed Name Registration Certificates</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>
<input type="checkbox"/>	<p>Financial Statement: Most recent financial statement that demonstrates a net worth of at least \$500,000 must be submitted related to this change type. Financial statements must be under the new name change.</p>	<p>NMLS</p>
<input type="checkbox"/>	<p>Organizational Chart/Description: A list of shareholders of the new entity which includes the number of shares owned by each shareholder.</p>	<p>Upload in NMLS: under the Document Type <u>Organizational Chart/Description</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>
<input type="checkbox"/>	<p>Franchise Taxes: A franchise tax account status from the Texas Comptroller of Public Accounts which evidences that the license holder (must be under new name) is current for the payment of franchise taxes.</p>	<p>Upload in NMLS: under the Document Type <u>Certificate of Authority/Good Standing Certificate</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>

NMLS ID Number	
Licensee Legal Name	

Complete	TX-DOB Money Transmission License Change of Main Address Amendment Items	Submitted via...
<input type="checkbox"/>	Change of Main Address: Submit an amendment for a change of Main (Corporate) Address through the Company Form (MU1) in NMLS no later than the 15 th day after the date the license holder knows or has reason to know of a material change in the information reported in an application or annual report. Refer to Texas Finance Code Section 151.603 .	NMLS
Note	Change of Main Address: \$0 per license Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	N/A
<input type="checkbox"/>	Surety Bond Rider: Provide an electronic surety bond rider in NMLS(or new bond if applicable) that reflects the entity's new main address. Contact the surety bond producer to inform them of the main address change and effective date, so the producer can initiate the Surety Bond Rider Process in NMLS. See the ESB Adoption Table and the ESB for NMLS Licensees page of the NMLS Recourse Center for more information.	Electronic Surety Bond in NMLS

NMLS ID Number	
Licensee Legal Name	

Complete	TX-DOB Money Transmission License Change of Legal Status Amendment Items	Submitted via...
<p>Note: In many cases, a change to the Fiscal Year End, Legal Status, and State or Date of Formation indicates a new entity has been formed and a new NMLS record is required. This includes the creation of a new NMLS account and submission of a new Company Form (MU1).</p>		
<input type="checkbox"/>	<p>Change of Legal Status: Submit an amendment for a change in Legal Status within the Company Form (MU1) in NMLS no later than the 15th day after the date the license holder knows or has reason to know of a material change in the information reported in an application or annual report. Refer to Texas Finance Code Section 151.603.</p>	NMLS
<input type="checkbox"/>	<p>Financial Statement: Most recent financial statement that demonstrates a net worth of at least \$500,000 must be submitted related to this change type.</p>	NMLS
<input type="checkbox"/>	<p>Surety Bond Rider: Provide an electronic surety bond rider in NMLS (or new bond if applicable) that reflects the new legal status.</p> <p>Contact the surety bond producer to inform them of the legal status change and effective date, so the producer can initiate the Surety Bond Rider Process in NMLS. See the ESB Adoption Table and the ESB for NMLS Licensees page of the NMLS Recourse Center for more information.</p>	Electronic Surety Bond in NMLS
<input type="checkbox"/>	<p>Formation Documents: Formation Documents must be submitted related to this change type.</p> <p>Determine classification of applicant's legal status and submit a State certified copy of the requested applicable documentation detailed below. Provide original formation documents and all subsequent amendments, thereto including a list of any name changes.</p> <ul style="list-style-type: none"> • Upload a copy of the filed license holder's Certificate of Formation or other organizing documents; • Upload evidence of registration with the Texas Secretary of State, if the license holder is not a Texas entity. 	<p>Upload in NMLS: under the Document Type Formation Document in the <i>Document Uploads</i> section of the Company Form (MU1).</p>
<input type="checkbox"/>	<p>Other Trade Name Documentation: File stamped copies of any assumed name filings with the Secretary of State and the county if any assumed names are to be used.</p>	<p>Upload in NMLS: under the Document Type Trade Name/Assumed Name Registration Certificates in the <i>Document Uploads</i> section of the Company Form (MU1).</p>

NMLS ID Number	
Licensee Legal Name	

Complete	TX-DOB Money Transmission License Addition or Modification of Directors/Executive Officers Amendment Items	Submitted via...
<input type="checkbox"/>	Addition or Modification of Directors/Executive Officers: Submit an amendment for an addition or change in Directors/Executive Officers within the <i>Direct Owners/Executive Officers</i> section of the Company Form (MU1) in NMLS no later than the 15 th day after the date the license holder knows or has reason to know of a material change in the information reported in an application or annual report. Refer to Texas Finance Code Section 151.603 .	NMLS
Note	Credit Report: Credit Reports and authorizations for credit report through NMLS are not required.	N/A
<input type="checkbox"/>	Supervisory Memorandum: Refer to Supervisory Memorandum (SM) - 1036 and click Open then scroll down to Supervisory Memorandums. Submit any documentation required in SM 1036.	Upload in NMLS: under the Document Type State Background Check Authorization in the <i>Document Uploads</i> section of the Individual Form (MU2).

NMLS ID Number	
Licensee Legal Name	

Complete	TX-DOB Money Transmission License Addition or Modification of Direct or Indirect Owners Amendment Items	Submitted via...
<input type="checkbox"/>	<p>Addition or Modification of Direct or Indirect Owners: Submit an ACN for an addition or change in Direct Owners or Indirect Owners within the <i>Direct Owners/Executive Officers</i> or <i>Indirect Owners</i> sections of the Company Form (MU1) in NMLS respectively. A change in the control of the licensee is considered an application. The application and ACN must be received at least 45 days in advance of the proposed date of acquisition.</p> <p>Section 151.605 of the Texas Finance Code (the Code) states that a person or group of persons acting in concert may not directly or indirectly acquire control of a license holder without the written approval of the Commissioner. The same standards and qualifications for a new license apply. Applications must be received at least 45 days in advance of the proposed date of acquisition.</p> <p>See Section 151.605 (g) for the statutory exemption from the approval requirement. In the case that the proposed transaction qualifies for an exemption, a notice filing is required no later than the 15th day after the change of control becomes effective. See TFC §151.605 (g) for details of exemptions from the approval requirement and TFC §151.605(h) for applicability.</p> <p>To whom does this Section apply?</p> <p>Generally, any person, legal or natural, or group acting in concert who owns or controls 25% or more of either the license holder or an entity that controls the license holder (see §151.002, Definitions).</p>	NMLS
<input type="checkbox"/>	<p>Addition or Modification of Direct or Indirect Owner: \$1,000 filing fee pursuant to 7 TAC § 33.27(f). Fees are NOT REFUNDABLE.</p>	TX DOB will issue an invoice via NMLS after the ACN is submitted
<input type="checkbox"/>	<p>Credit Report: Authorize a credit report in NMLS</p>	Authorize a credit report in NMLS
<input type="checkbox"/>	<p>Business Plan: Upload an updated business plan containing any changes.</p>	<p>Upload in NMLS: under the Document Type <u>Business Plan</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>

Complete	TX-DOB Money Transmission License Addition or Modification of Direct or Indirect Owners Amendment Items	Submitted via...
<input type="checkbox"/>	<p>Organizational Chart: Upload an updated organizational chart showing the percentage ownership of:</p> <ul style="list-style-type: none"> • Direct Owners (total direct ownership percentage must equate to 100%) • Indirect Owners • Subsidiaries and Affiliates of the applicant/licensee <p>This document should be named <i>[Company Legal Name] Organizational Chart/Description</i>.</p>	<p>Upload in NMLS: under <u>Organizational Chart/Description</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>
<input type="checkbox"/>	<p>FBI Criminal Background Check for MU2 Individual: \$36.25 per person.</p>	<p>NMLS (Filing submission)</p>
<input type="checkbox"/>	<p>MU2 Individual FBI Criminal Background Check Requirements: Extensive background checks are conducted on each proposed new control shareholders, principals of the Applicant and responsible individuals. See §151.002 for definitions and Supplemental Forms section in the <i>Documents Required</i> section below for additional requirements. These checks include law enforcement agencies, credit reports, and other regulators.</p> <p>The following Individuals, as specified below, on the Company Form (MU1) are required to authorize a FBI criminal background check (CBC) through NMLS.</p> <p>Please note that non-U.S. Citizens who are required to authorize a CBC through NMLS and have not resided in the U.S. for at least the last 10 years, must have an investigative background report prepared by an acceptable search firm in lieu of authorizing a CBC in NMLS. See Documents Required section below below for additional requirements.</p> <p><i>Proposed Direct Owners</i></p> <ul style="list-style-type: none"> • Individuals with the power to directly vote 25% or more of the outstanding voting interest of the applicant. <p><i>New Executive Officers</i></p> <ul style="list-style-type: none"> • Executive officers, directors, general partner, trustee, or manager of the applicant as applicable. <p><i>Proposed Indirect Owners</i></p> <ul style="list-style-type: none"> • Individuals with the power to indirectly vote 25% or more (includes an individual whose ownership is through one or more legal entities) of the outstanding voting interest of the applicant. <p><i>Qualifying Individuals</i></p> <ul style="list-style-type: none"> • Any individuals that fall under the definition of Responsible Individual found in Texas Finance Code Section 151.002 (b) (20) which states in part, “an individual who has direct control over significant management policy and decision-making authority...” 	<p>NMLS</p>

Complete	TX-DOB Money Transmission License Addition or Modification of Direct or Indirect Owners Amendment Items	Submitted via...
	<p>After authorizing a FBI criminal background check through the submission of the Company Form (MU1) and Individual Form (MU2), you must schedule an appointment to be fingerprinted if new prints are required.</p> <p>See the Quick Guides - Company section of the NMLS Resource Center for more information.</p> <p>Note: If you are able to 'Use Existing Prints' to process the FBI criminal background check, you DO NOT have to schedule an appointment. NMLS will automatically submit the fingerprints on file.</p> <p>Refer to the definitions contained in §151.002(b) of the Code for definitions of Executive Officer, Control, Principal and Responsible individual.</p>	
<input type="checkbox"/>	<p>Transaction Summary :upload a transaction summary which must also include the following information:</p> <ul style="list-style-type: none"> • A general summary including background and experience in the money services business and detail on shareholder(s) to be effected. • Information on how the applicant intends to pay for the acquisition. • Explanation of changes to the business plan or corporate structure • A listing of any individuals with the power to directly or indirectly vote 25% of the outstanding voting interest of the acquirer and the license holder. • Outline proposed changes to executive officers, directors, general partner, trustee, or managers of the licensee as applicable. 	<p>Upload in NMLS: under the Document Type <u>ACN Related Documents</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>
<input type="checkbox"/>	<p>Formation Documents: If a legal entity is the proposed controlling shareholder, the entity must upload a copy of the entity's organizing documents.</p>	<p>Upload in NMLS: under <u>Formation Document</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> <p>This document should be named <i>Formation Documentation [Date of Creation (MM-DD-YYYY)]</i>.</p>

Complete	TX-DOB Money Transmission License Addition or Modification of Direct or Indirect Owners Amendment Items	Submitted via...
<input type="checkbox"/>	<p>Financial Statements for Controlling Entities: Legal Entities directly or indirectly controlling 50% or more of the license holder must submit a current certified financial statement.</p>	<p>Upload in NMLS: under the Document Type <u>ACN Related Documents</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>
<input type="checkbox"/>	<p>Supplemental Forms: Natural persons that will have the power to directly or indirectly vote 25% or more (includes an individual whose ownership is through one or more legal entities) of the outstanding voting interest of the license holder, new executive officers, directors, general partner, trustee, or manager of the licensee, must provide the following:</p> <ul style="list-style-type: none"> ○ Complete an Individual Form (MU2); and ○ Upload the following: <ol style="list-style-type: none"> 1. Authority to Release Information – Form 2. Supplemental Page – Form 3. Personal Financial Statement – Form <p>Note: Personal Financial Statements, whether required only for an individual or for an individual and spouse, may include joint financial information for both spouses. Joint financial statements must be signed by both spouses.</p> 4. Search Firm Report (if applicable)– Instructions * <p>Note: Executive Officer - Includes any “responsible individual” as defined in §151.002 (b)(20) which states in part, “an individual who has direct control over significant management policy and decision-making authority...”.</p> <p>Refer to the definitions contained in §151.002(b) for definitions of Executive Officer, Control, Principal and Responsible individual.</p> <p>For addition information regarding change of control filings refer to Texas Finance Code §151.605.</p> <p>Supplemental form requirements for complex organizational structures will be evaluated on a case-by-case basis. Pre-submission of the organizational chart and proposed structure may be necessary to determine the applicability of various forms.</p>	<p>Upload in NMLS: under the Individual Document Upload Section Individual Form (MU2).</p> <p>*The search firm report must be submitted directly to the Department.</p>
<input type="checkbox"/>	<p>Spouse: Applicants who are individuals or wholly owned directly or indirectly by a single individual must have spouses of the controlling owners also submit the following:</p> <ul style="list-style-type: none"> • Fingerprints outside of NMLS (Instructions); 	<p>Mail to TX DOB</p>

Complete	TX-DOB Money Transmission License Addition or Modification of Direct or Indirect Owners Amendment Items	Submitted via...
	<ul style="list-style-type: none"> • Authority to release information - Form • Statement of personal history. 	
<input type="checkbox"/>	Agreement: Stock Purchase Agreement or other binding agreement to effect the sale contemplated by the application, including the purchase price.	Upload in NMLS: under the Document Type ACN Related Documents in the <i>Document Uploads</i> section of the Company Form (MU1).
<input type="checkbox"/>	Pro Forma Financial Statements: Pro forma financial statements, including assumptions that show the effect on the licensee immediately on consummation and projections for the first full year of operations.	Upload in NMLS: under the Document Type ACN Related Documents in the <i>Document Uploads</i> section of the Company Form (MU1).
	Management Chart: Upload an updated management chart displaying the applicant's Board of Directors, Board of Managers, or any individuals that otherwise will control or direct the activities of the licensee (provide individual name and title).	Upload in NMLS: under the Document Type ACN Related Documents in the <i>Document Uploads</i> section of the Company Form (MU1).

Complete	TX-DOB Money Transmission License Addition or Modification of Other Trade Name Amendment Items	Submitted via...
<input type="checkbox"/>	Addition or Modification of Other Trade Name: Submit an amendment for an addition of or change to another Trade Name through the Company Form (MU1) in NMLS no later than the 15 th day after the date the license holder knows or has reason to know of a material change in the information reported in an application or annual report. Refer to Texas Finance Code Section 151.603 .	NMLS
Note	Addition of Other Trade Name \$0 per license. Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	N/A
<input type="checkbox"/>	Trade Name/Assumed Name Registration Certificates: File stamped copies of Trade Name/Assumed Name Registration Certificates must be submitted related to this change type.	Upload in NMLS: under the Document Type <u>Trade Name/Assumed Name Registration Certificates</u> in the <i>Document Uploads</i> section of the Company Form (MU1).

Complete	TX-DOB Money Transmission License Deletion of Other Trade Name Amendment Items	Submitted via...
<input type="checkbox"/>	Deletion of Other Trade Name: Submit an amendment for deletion of another Trade Name through the Company Form (MU1) in NMLS no later than the 15 th day after the date the license holder knows or has reason to know of a material change in the information reported in an application or annual report. Refer to Texas Finance Code Section 151.603 . If deleting another Trade Name, this name must be removed from the <i>Other Trade Names</i> section of the Company Form (MU1).	NMLS
<input type="checkbox"/>	Trade Name/Assumed Name Registration Certificates: Remove the File stamped copies of Trade Name/Assumed Name Registration Certificates uploaded to NMLS related to this other trade name.	Remove from NMLS: <i>Document Uploads</i> section of the Company Form (MU1).

Complete	TX-DOB Money Transmission License Addition or Modification of Affiliates/Subsidiaries Amendment Items	Submitted via...
<input type="checkbox"/>	Addition or Modification of Affiliates/Subsidiaries: Submit an amendment for an addition or change in Affiliates/Subsidiaries within the Company Form (MU1) in NMLS no later than the 15 th day after the date the license holder knows or has reason to know of a material change in the information reported in an application or annual report. Refer to Texas Finance Code Section 151.603 .	NMLS

Complete	TX-DOB Money Transmission License Change of Disclosure Question(s) Amendment Items	Submitted via...
<input type="checkbox"/>	Change of Disclosure Question(s): Submit an amendment for a change to Disclosure Question response(s) through the Company Form (MU1) in NMLS.	NMLS
<input type="checkbox"/>	Changing a Response from No to Yes: Provide a complete and detailed explanation and document upload for each response that changes from “No” to “Yes” for company or each control person. See the Company Disclosure Explanations Quick Guide for instructions.	Upload in NMLS in the <i>Disclosure Explanations</i> section of the Company Form (MU1) or Individual Form (MU2).
<input type="checkbox"/>	Changing a Response from Yes to No: When changing a Disclosure Question response from Yes to No, you will be required to remove the question from the associated Disclosure Explanation and provide an Amendment Reason. You must select “Add Explanation For “No” Responses” and provide an explanation for each response that changes from “Yes” to “No” for company or each control person. You must also upload a document (PDF) related to the explanation. See the Company Disclosure Explanations Quick Guide for instructions.	NMLS